

LAW OFFICES OF MARK BRATKOVSKY, PC.
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VIA ECF

July 5, 2016

**The Honorable Steven M. Gold
United States Magistrate Judge
United States District Court of the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201**

Re: Geico v. Kiner 15-03135

LETTER MOTION TO BE RELIEVED AS COUNSEL FOR THE DEFENDANTS
UNIVERSAL REHAB, TAMER GAD, AND NON- PARTY SUBPOENAD
INDIVIDUAL MARIA GAD

Dear Honorable Judge Gold,

By way of brief background, our office was retained on or about December 2015. We have attempted intensive settlement discussions with the Plaintiff's, however, such discussion was terminated and withdrawn by the Plaintiff's on or about May 2016.

On June 28, 2016 at 3:30 PM, the Court held a phone conference regarding outstanding discovery and ordered our firm to provide discovery by end of business July 5, 2016.

Our firm had provided discovery responses to the Plaintiff on Friday July 1, 2016 via email transmission. On July 5, 2016, via text message, our client had requested that we inform the Court and Plaintiff's counsel that they wish to no-longer be represented by counsel, and that they are out of the Country until July 28th 2016.

In short, without disclosing the substance and nature of my communications with the client, the Defendant and this affiant have substantial difference of opinions as to the continuation of the litigation, the financial compensation owed to the firm, and the client has terminated our representation.

Our firm now respectfully requests that the Court allow the Law Offices of Mark Bratkovsky P.C. to be relieved as counsel as we have been terminated and are unable to proceed with the litigation of the case and to allow the Defendants time to find new counsel and stay the deposition scheduled for Monday, July 11, 2016, of non-party Maria Gad.

It is in our opinion that a resolution to the case is imminent, the Defendant has requested that the court schedule an in person settlement conference any time after July 28, 2016.

Respectfully submitted,

/s/Steven Yuniver (SY 4383)

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